

Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JESSICA BENTON, SHELTY BRYANT,
ANNE MARIE CAVANAUGH, ALYSSA
GARRISON, and CLARE THOMAS,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

No. 2:20-CV-01174 RAJ

DECLARATION OF GHAZAL SHARIFI

I, Ghazal Sharifi, being over the age of 18 and competent to testify, declare the following:

(1) I am one of the counsel of record for the City of Seattle.

(2) The morning of August 3, 2020, I received a phone call from Plaintiffs' counsel notifying me that the Plaintiffs intended to file a Complaint against the City of Seattle. Plaintiffs' counsel also advised that Plaintiffs' intended to file a TRO against the City of Seattle.

(3) Counsel identified that the Complaint and TRO were related to the City's crowd management tactics and the use of less lethal devices. Counsel identified that Plaintiffs' are requesting relief in the form of a prohibition of use of less lethal devices by Seattle Police.

DECLARATION OF GHAZAL SHARIFI - 1 (2:20-cv-01174 RAJ)

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1 (4) I asked Plaintiffs' counsel if she was aware of the existing litigation in *Black Lives Matter v.*
2 *City of Seattle*, Case No. 2:20-cv-00887-RAJ (W.D. Wash. June 17, 2020) and *United States*
3 *v. City of Seattle*, 12-cv-1282-JLR governing overlapping issues. Plaintiffs' counsel
4 acknowledged that she was aware of those cases. I asked Plaintiffs' counsel if Plaintiffs were
5 requesting that Judge Robarts' or this Court's Orders be modified or stricken. Specifically,
6 Plaintiffs' counsel noted that she understood that the implementation of Seattle City Council
7 legislation Ordinance No. 119805 was temporarily enjoined by Judge Robart. Counsel further
8 noted that Plaintiffs' position was that this Court's preliminary injunction in *Black Lives*
9 *Matter* does not go far enough to protect the rights of demonstrators. Plaintiffs' counsel,
10 therefore, represented that Plaintiffs are seeking a court order to outright prohibit the use of
11 the devices.

12 (5) Plaintiffs' counsel asked if the City would stipulate to such a TRO. I indicated that the City
13 could not agree.

14 (6) I asked for a copy of what Plaintiffs intended to file. Counsel indicated that she intended to
15 provide a copy upon filing, which she promptly did.

16
17 DATED this 4th day of August, 2020.

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19 By: /s/ Ghazal Sharifi
20 Ghazal Sharifi, WSBA# 47750
21 Assistant City Attorney
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